

Nicole Miller
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Federal Election Commission
Washington, DC 20463

Re: Human Rights Campaign PAC (2008 Election Cycle)
Identification Number: C00235853

This letter responds to a telephone request by Dan Buckley on August 14, 2009 regarding HRC PAC's filings for the 2008 election cycle. Mr. Buckley asked that we file a miscellaneous report to summarize our "best efforts" procedures during this timeframe.

During the 2008 election cycle HRC had established procedures consistent with the FEC's "best efforts" regulations:

- a. First, HRC PAC solicitations include a clear and conspicuous request for the contributor identification information and inform the contributor of the requirements of federal law for the reporting of such information.
- b. Second, HRC PAC makes one follow-up, stand alone effort to obtain this information, whether the contribution(s) was solicited or not. This effort occurs within 30 days after receipt of the contribution in the form of a written or oral request. Requests clearly ask for the missing information without soliciting a contribution and inform the contributor of the requirements of federal law for the reporting of such information. Written requests include a pre-addressed return envelope.
- c. Third, when HRC PAC receives contributor information after the contribution(s) have been reported, we file amendments to the report(s) originally disclosing the contribution(s) in compliance with the regulations.

In response to requests for additional information received during the 2008 election cycle, HRC PAC also initiated a further review of its procedures in order to obtain updated contributor information from recurring contributors. These steps were specifically outlined in a miscellaneous report filed on December 2, 2008.

I hope this additional information answers your specific requests. Should you need further information, please feel free to contact me at (202) 216-1549 or Darrin Hurwitz, Assistant General Counsel, at (202) 572-8914.

Sincerely,

Jim Rinefied
Treasurer
